

## Doreen Carrell

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**From:** Mickey Mills <mickey@millsmediation.com>  
**Sent:** Monday, November 14, 2022 3:26 PM  
**To:** Terry E. Johnson  
**Cc:** Steffan T. Keeton; rsage@rogersage.com; lkielman@rogersage.com  
**Subject:** [EXTERNAL] Re: Pines Bach, LLP v. Mills - US District Court - Western Case No. 3:22-CV-66 - Expert Depositions

It is ok to respond to me. It is unfair to characterize my response as not cooperating. I'm not in a position to know what expert to substitute from Wisconsin. Once my counsel returns from his surgeries he will ask the court to deal with this issue.

M. A. "Mickey" Mills

On Nov 14, 2022, at 3:16 PM, Terry E. Johnson <terry.johnson@vonbriesen.com> wrote:

While we are certainly opposed to your changing to a new expert, whether you attempt to do that or not and whether that attempt is successful or not, the deposition request remains.

Without a positive response, we will simply set up whatever expert deposition we may need to do on subpoena and notice. If you are unwilling or unable to cooperate in selecting a date, we will be unable to accommodate your schedule or that of your expert.

Based on your email, I am responding directly to you but copying Mr. Keeton.

**Terry E. Johnson | von Briesen & Roper, s.c.**  
Direct: 414-221-6605 | [terry.johnson@vonbriesen.com](mailto:terry.johnson@vonbriesen.com)

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**From:** Mickey Mills <mickey@millsmediation.com>  
**Sent:** Monday, November 14, 2022 2:21 PM  
**To:** Doreen Carrell <doreen.carrell@vonbriesen.com>  
**Cc:** stkeeton@keetonfirm.com; rsage@rogersage.com; lkielman@rogersage.com; Terry E. Johnson <terry.johnson@vonbriesen.com>  
**Subject:** [EXTERNAL] Re: Pines Bach, LLP v. Mills - US District Court - Western Case No. 3:22-CV-66 - Expert Depositions

Thank you for the email. My counsel is recovering from his various surgeries and is unable to respond. Since he was not available to deal with the designation of an expert I did it. Since the expert is from Texas and I did not have time to find a Wisconsin expert we will want to substitute the expert once my counsel is back at work. If you have any questions please give me a call while my counsel is still recovering from his surgeries .

M. A. "Mickey" Mills

On Nov 14, 2022, at 1:58 PM, Doreen Carrell <[doreen.carrell@vonbriesen.com](mailto:doreen.carrell@vonbriesen.com)> wrote:

Mr. Keeton,

Please see the attached correspondence from Terry Johnson.

Thank you,

*Doreen*

**Doreen Carrell | Legal Assistant**  
**von Briesen & Roper, s.c.**  
411 East Wisconsin Avenue, Suite 1000  
Milwaukee, WI 53202

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